



February 15, 2019

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

ATTN: Video Division, Media Bureau

Re: MB Docket No. 18-383, RM-11822
Comments in Support of NPRM to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of ION Media License Company, LLC, licensee of commercial television station WNPX-TV, Cookeville, Tennessee, I hereby transmit the enclosed Comments in support of the Notice of Proposed Rulemaking to delete Channel 36 at Cookeville, Tennessee, and substitute Channel 36 at Franklin, Tennessee in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Terri McGalliard", written over a horizontal line.

By: Terri McGalliard, Secretary
ION Media License Company, LLC

Enclosure

cc: Ms. Joyce Bernstein (*via e-mail*)
Mr. David Brown (*via e-mail*)
Mr. Darren Fernandez (*via e-mail*)
Ms. Terri M. Santisi (*via e-mail*)

**Before the
FEDERAL COMMUNICATIONS
COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.622(i))	MB Docket No. 18-383
Digital Television Table of Allotments)	RM-11822
(Cookeville and Franklin, Tennessee))	

To: Office of the Secretary
Attn: Chief, Video Division, Media Bureau

COMMENTS AND EXPRESSION OF CONTINUED INTEREST

ION Media License Company, LLC ("ION") licensee of WNPX-TV, Cookeville, Tennessee, FCC Facility Identification Number 28468 (the "Station"), pursuant to Sections 1.415 and 1.419 of the Commission's Rules,¹ hereby submits these comments in response to the Commission's Notice of Public Rulemaking (the "*NPRM*") in the above-captioned proceeding. The *NPRM* proposes to delete Channel 36 at Cookeville, Tennessee and substitute Channel 36 at Franklin, Tennessee in the DTV Table of Allotments. ION strongly supports the proposed substitution to change the Station's community of license, and ION hereby expresses its continuing interest in pursuing the reallocation of Channel 36 from Cookeville to Franklin. Substitution of Franklin, Tennessee as the Station's community of license with continued operations on Channel 36 will represent a preferential arrangement of allotments by affording Franklin its first local full-power television service in satisfaction of the Commission's second allotment priority.²

¹ 47 C.F.R. §§ 1.415, 1.419.

² *NPRM* at ¶ 3.

As demonstrated in the Petition, Franklin is a vibrant, substantial community of 62,487. Franklin is the county seat of Williamson County, Tennessee, and has an active local government that oversees the city's fourteen departments, including the City of Franklin fire and police departments. Franklin has fourteen public schools, five local newspapers, eight hospital/medical centers, and over 127 churches. By any measure, Franklin is a community deserving of a first local television service.

Moreover, ION asserts that Cookeville, population 30,435, will continue to have a station allotted to it, WCTE(TV), licensed to Upper Cumberland Broadcast Council, on channel *22 at Cookeville.

As described in its petition for rulemaking and in the foregoing, ION strongly supports the proposed rulemaking to substitute Franklin for Cookeville as the community of license for WNPX-TV. Allowing WNPX-TV to change its community of license from Cookeville to Franklin is in the public interest, and the FCC should approve the NPRM promptly.

Respectfully submitted,
ION Media License Company, LLC



By: Terri McGalliard, Secretary

February 15, 2019